

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CHERYL SAGATAW,
DEANTHONY BARNES, ROBERTA
STRONG, and TRAVIS NELOMS *on behalf*
of themselves and a class of
similarly-situated individuals,
Plaintiffs,

Case No. 20-CV-02189 (ECT/JFD)

FED. R. CIV. P. 26(a)(1)
DISCLOSURES BY DEFENDANT
MAYOR JACOB FREY

vs.

MAYOR JACOB FREY, *in his individual and*
official capacity
Defendant.

Pursuant to Fed. R. Civ. P. 26(a)(1), Defendant Minneapolis Mayor Jacob Frey (“Defendant”) makes the following initial disclosures concerning the disputed facts alleged with particularity in the pleadings.

INTRODUCTORY STATEMENT

The following disclosures are made based on the information reasonably available to Defendant as of the date hereof. By making these disclosures, Defendant does not represent that he is identifying every document, tangible thing, or witness that he may possibly use to support his claims or defenses. Defendant does not waive his right to object to production of any document or tangible thing disclosed herein on the basis of any privilege, the work product

doctrine, relevancy, undue burden, or any other valid objection. Defendant's disclosures represent a good faith effort to identify information he reasonably believes he may use to support his claims or defenses, unless solely for impeachment, as required by Rule 26(a)(1).

Finally, Defendant's disclosures are made without in any way waiving: (1) the right to object on the grounds of competency, privilege, relevancy and materiality, hearsay, data classification or any other proper ground, to the use of any such information, for any purpose, in whole or in part, in any subsequent proceeding in this action or any other action; and (2) the right to object on any and all grounds, at any time, to any other discovery request or proceeding involving or relating to the subject matter of these disclosures.

All of the disclosures set forth below are made subject to the above objections and qualifications.

- A. The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that Defendant may use to support his claims or defenses, unless the use would be solely for impeachment.

DEFENDANT'S DISCLOSURES: Minneapolis Mayor Jacob Frey, identifies the following individuals, all of whom may be contacted through counsel:

IDENTITY	SUBJECT OF INFORMATION
Damon O. Chaplin, Commissioner of Health, City of Minneapolis Health Department	Information regarding the City of Minneapolis's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.
Suzanne Young, Senior Project Manager, City of Minneapolis Health Department	Information regarding the City of Minneapolis's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.
Maikao Vue, Manager of Housing Response Coordinators, City of Minneapolis Regulatory Services Department	Information regarding the City of Minneapolis's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.
Jose Acuna, Homeless Response Coordinator, City of Minneapolis Health Department	Information regarding the City of Minneapolis's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.
Erik Hansen, Director, City of Minneapolis Community Planning and Economic Development	Information regarding the City of Minneapolis's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.
Elfric Porte, II, Director of Housing Policy & Development, City of Minneapolis Community Planning and Economic Development	Information regarding the City of Minneapolis's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.

IDENTITY	SUBJECT OF INFORMATION
Enrique Velazquez, Director Regulatory Services, City of Minneapolis Regulatory Services Department	Information regarding the City of Minneapolis's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.
David Herberholz, Director, City of Minneapolis Department of Public Works, Solid Waste and Recycling Division	Information regarding the City of Minneapolis's policies, response, and cleanup efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.
Chief Brian O'Hara, City of Minneapolis Police Department	Information regarding the Minneapolis Police Department's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.
Assistant Chief Christopher Gaiters, City of Minneapolis Police Department	Information regarding the Minneapolis Police Department's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.
Assistant Chief Katie Blackwell, City of Minneapolis Police Department	Information regarding the Minneapolis Police Department's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.
Commander Erick Fors, City of Minneapolis Police Department	Information regarding the Minneapolis Police Department's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.

IDENTITY	SUBJECT OF INFORMATION
Deputy Chief Travis Glampe, City of Minneapolis Police Department	Information regarding the Minneapolis Police Department's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.
Commander DeChristopher Granger, City of Minneapolis Police Department	Information regarding the Minneapolis Police Department's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.
Deputy Chief Jason Case, City of Minneapolis Police Department	Information regarding the Minneapolis Police Department's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.
Deputy Chief Jonathan Kingsbury, City of Minneapolis Police Department	Information regarding the Minneapolis Police Department's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.
Deputy Chief Mark Montgomery, City of Minneapolis Police Department	Information regarding the Minneapolis Police Department's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.

IDENTITY	SUBJECT OF INFORMATION
Commander Monica Hanson, City of Minneapolis Police Department	Information regarding the Minneapolis Police Department's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.
Inspector Jose Gomez, City of Minneapolis Police Department	Information regarding the Minneapolis Police Department's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.
Inspector Christie Nelson, City of Minneapolis Police Department	Information regarding the Minneapolis Police Department's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.
Lieutenant John Haugland, City of Minneapolis Police Department	Information regarding the Minneapolis Police Department's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.
Sergeant William Martin, City of Minneapolis Police Department	Information regarding the Minneapolis Police Department's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.
Fire Chief Bryan Tyner, City of Minneapolis Fire Department	Information regarding the City of Minneapolis's policies and response, with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.

IDENTITY	SUBJECT OF INFORMATION
Assistant Chief Melanie Rucker, City of Minneapolis Fire Department	Information regarding the City of Minneapolis's policies and response with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.
Deputy City Operations Officer Brette Hjelle	Information regarding the City of Minneapolis's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.
Narin Sihavong, Project Coordinator, City of Minneapolis Community Planning and Economic Development	Information regarding the City of Minneapolis's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness City of Minneapolis-owned land, and the condition of those encampments.
Nicholas Gerold, General Foreman, City of Minneapolis Department of Public Works, Solid Waste and Recycling Division	Information regarding the City of Minneapolis's policies, response, and outreach efforts with respect to encampments of people experiencing homelessness on City of Minneapolis-owned land, and the condition of those encampments.
Plaintiff Cheryl Sagataw	Information regarding her claims set forth in the amended complaint.
Plaintiff DeAnthony Barnes	Information regarding his claims set forth in the amended complaint.
Plaintiff Roberta Strong	Information regarding her claims set forth in the amended complaint.
Plaintiff Travis Neloms	Information regarding his claims set forth in the amended complaint.

Defendant Mayor Jacob Frey reserves the right to designate additional individuals, including: those identified by other parties in their Rule 26 initial disclosures or responses to discovery in this matter; persons identified in documents produced or disclosed in this matter; and persons whose identities may become known as investigation and discovery continue.

- B. A copy of, or a description by category and location of, all documents, data compilations and tangible things in the possession, custody, or control of the Defendant and that Defendant may use to support his claims or defenses, unless solely for impeachment.

Relevant body worn camera footage and city surveillance footage of encampment closures. Footage will be produced on a rolling basis concurrent with the issuance of a protective order.

Communications to City of Minneapolis employees from residents and businesses about the conditions at and effect of encampments on the surrounding community. Documents will be produced on a rolling basis after the issuance of a protective order.

Police reports and 911 calls documenting the calls for service at the encampment locations. Documents will be produced on a rolling basis after the issuance of a protective order.

Any documents relating to health conditions or public safety conditions at or near the encampment locations.

Any document referenced in the City's Oppositions to the Plaintiffs' motions for temporary restraining orders.

- C. A computation of all damages claimed by the Defendant, including materials bearing on the nature and extent of injuries suffered.

Not applicable.

- D. Any insurance agreement which may cover all or part of the judgment or to indemnify or reimburse payments made to satisfy the judgment.

The City of Minneapolis is self-insured.

Dated: June 17, 2024

KRISTYN ANDERSON

City Attorney

By /s/ Sharda Enslin

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